

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

v.

**CIVIL ACTION NO.: 1:19cv196-SA-DAS**

**RANDY D. YOUNG**

**DEFENDANT**

**STIPULATED CONSENT DECREE AND FINAL JUDGMENT**

THIS CAUSE comes before the Court upon the United States' request that the Court enter an agreed-upon Stipulated Consent Decree and Final Judgment. Plaintiff, the United States of America, brought this action against Randy D. Young, pursuant to the Fraud Injunction Statute, 18 U.S.C. § 1345. Plaintiff's Complaint alleged Defendant Young was violating or is about to violate 18 U.S.C. § 1343 by executing a scheme and artifice to defraud for obtaining money or property by means of false or fraudulent representations with the intent to defraud, and in so doing, use the U.S. mail or interstate or foreign wire communications.

Plaintiff and Defendant, pro se, wish to resolve Plaintiff's allegations without litigation and jointly request and consent to the entry of this Stipulated Consent Decree and Final Judgment ("Consent Decree") without Defendant's admission of liability or wrongdoing.

Defendant has entered into this Consent Decree freely and without coercion. Defendant further acknowledges that he has read the provisions of this Consent Decree, understands them, and is prepared to abide by them.

Each party to this Consent Decree agrees to bear his own costs and fees incurred in connection with this action.

IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:

1. This Court has jurisdiction over this matter pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under 28 U.S.C. § 1391(b) and (c).
2. Defendant neither admits nor denies the allegations in the Complaint. Only for purposes of this action, Defendant admits the facts necessary to establish jurisdiction.
3. For purposes of this Consent Decree:
  - a. "Defendant" means Randy D. Young.
  - b. "Sweepstakes" refers to any person or entity that claims to provide or disburse winnings of any kind including money.
  - c. "Money transmitting business" refers to an individual or entity that, for a fee, receives payments from persons, entities or accounts for the purpose of transmitting those funds to another person, entity or account.
  - d. "Fee" refers to the payment or compensation of any kind, including but not limited to: processing fees, service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and gratuities.
4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined from engaging, participating or assisting in any sweepstakes business or money transmitting business.
5. It is further ordered that, for a period ending five years after the date of the entry of the Consent Decree, that Defendant shall cooperate fully and truthfully with the United States in any civil, criminal, and/or administrative investigation into any sweepstakes or money transmitting business in which the Defendant has been involved.

6. Within ten (10) days after entry of this Consent Decree, the Defendant is ordered to submit a written acknowledgement of receipt of this Consent Decree sworn under penalty of perjury:

Mississippi Public Service Commission  
Attn.: Johnny Dale, Jr.  
218 Main Street  
Nettleton, MS 38858

-and-

United States Attorney's Office  
Northern District of Mississippi  
Attn: J. Harland Webster - AUSA  
900 Jefferson Avenue  
Oxford, MS 38655

7. The Consent Decree shall not be modified except in writing by Plaintiff and the Defendant and approved by the Court.

8. This Consent Decree shall constitute a final judgment and order in this action.

9. This Court retains jurisdiction of this action for the purpose of enforcing or modifying this Consent Decree and for the purpose of granting such additional relief as may be necessary and appropriate.

ORDERED AND ADJUDGED this the 12<sup>th</sup> day of November, 2019.

Sharon Aycock  
UNITED STATES DISTRICT JUDGE

We hereby consent to the entry of the foregoing Decree.

**FOR DEFENDANT**

RANDY D. YOUNG

Randy D. Young

**FOR PLAINTIFF**

WILLIAM C. LAMAR  
United States Attorney

J. Harland Webster

BY:

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